

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

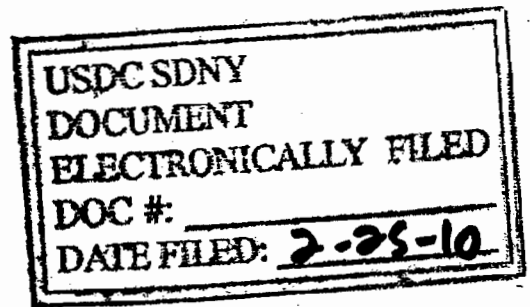
IN RE AMERICAN INTERNATIONAL  
GROUP, INC. SECURITIES LITIGATION

This Document Relates To:  
All Actions

ECF CASE

Master File No. 04 Civ. 8141 (DAB) (AJP)

AMENDMENT TO SETTLEMENT  
AGREEMENT CONFIDENTIALITY  
STIPULATION AND ORDER



WHEREAS, the Settlement Agreement Confidentiality Stipulation and Order dated October 2, 2009 (the "Confidentiality Order") limits disclosure of, *inter alia*, the Contingent Agreement of Compromise and Settlement (the "Settlement Agreement") between Ohio Public Employees Retirement System, State Teachers Retirement System of Ohio, and Ohio Police & Fire Pension Fund (collectively, "Lead Plaintiff"), on behalf of the Settlement Class (as defined in the Settlement Agreement), and certain defendants in the above-captioned matter;

WHEREAS, Paragraph 10 of the Confidentiality Order provides that the Confidentiality Order may be modified only by written stipulation of its signatories and Court order;

WHEREAS, the Honorable Charles E. Ramos of the New York State Supreme Court has requested a copy of the Settlement Agreement, because Justice Ramos believes it may be relevant to his decision on motions for summary judgment in *People of the State of New York v. Greenberg and Smith*, Index No. 401720/05, an action pending before him in the New York State Supreme Court;

WHEREAS, it is our understanding that any copies of the Settlement Agreement provided to Justice Ramos, and any duplicates made, either shall be destroyed or returned to

counsel for Lead Plaintiff after Justice Ramos rules on the pending motions for summary judgment in *People of the State of New York v. Greenberg and Smith*, Index No. 401720/05.

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for Lead Plaintiff, Maurice R. Greenberg, Howard I. Smith, Christian M. Milton, Michael J. Castelli, C.V. Starr & Co., Inc., and Starr International Company, Inc., parties to the above-captioned action, subject to the approval of the Court, that the Confidentiality Order shall be amended to provide for disclosure by counsel for Lead Plaintiff of one copy of the Settlement Agreement to Justice Ramos and his staff.

IT IS SO STIPULATED.

Dated: February 9, 2010

LABATON SUCHAROW LLP

By: 

Thomas A. Dubbs (TD 9658)

Louis Gottlieb (LG 9169)

140 Broadway

New York, New York 10005

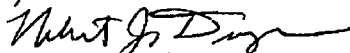
(212) 907-0700

(212) 818-0477 (Fax)

COUNSEL FOR LEAD PLAINTIFF AND  
THE CLASS

Dated: February 9, 2010

BOIES, SCHILLER & FLEXNER LLP

By:   
Robert J. Dwyer  
Nicholas A. Gravante  
575 Lexington Avenue, 7<sup>th</sup> floor  
New York, NY 10022  
Tel: (212) 446-2300  
Fax: (212) 446-2350

COUNSEL FOR MAURICE R. GREENBERG,  
C.V. STARR & CO., INC., AND STARR  
INTERNATIONAL COMPANY, INC.

Dated: February \_\_, 2010

WINSTON & STRAWN LLP

By: \_\_\_\_\_  
Vincent A. Sama  
Jeffrey Burke  
200 Park Avenue  
New York, NY 10166-4193  
Tel: (212) 294-6700  
Fax: (212) 294-4700

COUNSEL FOR HOWARD I. SMITH

Dated: February \_\_, 2010

HAFETZ & NECHELES

By: \_\_\_\_\_  
Frederick P. Hafetz  
Tracy E. Sivitz  
500 5th Ave, 29th Floor  
New York, NY 10110  
Tel: (212) 997-7595  
Fax: (212) 997-7646

COUNSEL FOR CHRISTIAN M. MILTON

Dated: February \_\_, 2010

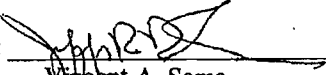
BOIES SCHILLER & FLEXNER LLP

By: \_\_\_\_\_  
Robert J. Dwyer  
Nicholas A. Gravante  
575 Lexington Avenue, 7<sup>th</sup> floor  
New York, NY 10022  
Tel: (212) 446-2300  
Fax: (212) 446-2350

COUNSEL FOR MAURICE R. GREENBERG,  
C.V. STARR & CO., INC., AND STARR  
INTERNATIONAL COMPANY, INC.

Dated: February 9, 2010

WINSTON & STRAWN LLP

By:  \_\_\_\_\_  
Vincent A. Sama  
Jeffrey Burke  
200 Park Avenue  
New York, NY 10166-4193  
Tel: (212) 294-6700  
Fax: (212) 294-4700

COUNSEL FOR HOWARD I. SMITH

Dated: February \_\_, 2010

HAFETZ & NECHELES

By: \_\_\_\_\_  
Frederick P. Hafetz  
Tracy E. Sivitz  
500 5th Ave, 29th Floor  
New York, NY 10110  
Tel: (212) 997-7595  
Fax: (212) 997-7646

COUNSEL FOR CHRISTIAN M. MILTON

Dated: February \_\_, 2010

BOIES SCHILLER & FLEXNER LLP

By: \_\_\_\_\_  
Robert J. Dwyer  
Nicholas A. Gravante  
575 Lexington Avenue, 7<sup>th</sup> floor  
New York, NY 10022  
Tel: (212) 446-2300  
Fax: (212) 446-2350

COUNSEL FOR MAURICE R. GREENBERG,  
C.V. STARR & CO., INC., AND STARR  
INTERNATIONAL COMPANY, INC.

Dated: February \_\_, 2010

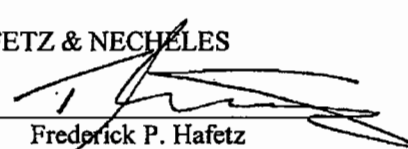
WINSTON & STRAWN LLP

By: \_\_\_\_\_  
Vincent A. Sama  
Jeffrey Burke  
200 Park Avenue  
New York, NY 10166-4193  
Tel: (212) 294-6700  
Fax: (212) 294-4700

COUNSEL FOR HOWARD I. SMITH

Dated: February 9, 2010

HAFETZ & NECHLES

By:  \_\_\_\_\_  
Frederick P. Hafetz  
Tracy E. Sivitz  
500 5th Ave, 29th Floor  
New York, NY 10110  
Tel: (212) 997-7595  
Fax: (212) 997-7646

COUNSEL FOR CHRISTIAN M. MILTON

Dated: February 9, 2010

DECHERT LLP

By: Charles I. Poret

Charles I. Poret  
1095 Avenue of the Americas  
New York, NY 10036-6797  
Tel: (212) 698-3500  
Fax: (212) 698-3599

COUNSEL FOR MICHAEL J. CASTELLI

SO ORDERED this 24<sup>th</sup> day of February, 2010.

Deborah A. Batts  
Hon. Deborah A. Batts 2/24/10  
United States District Judge